

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JUSTIN SEAN JOHNSON

No. 2:20-cr-00094-MRH

**SECOND MOTION FOR EXTENSION
OF TIME TO FILE PRETRIAL
MOTIONS**

Filed on Behalf of:
Justin Sean Johnson

Counsel of Record for this Party:

Nicola Henry-Taylor, Esq.
PA I.D. No. 79226

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AND NOW, comes the Defendant, Justin Sean Johnson, by and through his attorney, Nicola Henry-Taylor, Esquire, and respectfully moves this Honorable Court for an extension of time to file Pretrial Motions and in support thereof avers as follows:

1. Counsel was appointed to represent Justin Sean Johnson in the above-referenced docket on June 25, 2020.
2. Counsel seeks a ninety (90) day extension of time to file Pretrial Motions in order to continue discovery review, consult with the defendant, and meet with AUSA Melucci.
3. The time requested is necessary to serve the interest of justice by allowing counsel to review all evidence and prepare for trial.
4. The period of continuance is excluded from the computation of the time for the Speedy Trial Act, pursuant to 18 U.S.C. §§ 3161 (h)(7)(A); (B) (i) and (iv).
5. AUSA Melucci has consented to Defendant's Second Motion for Extension of Time to File Pretrial Motions via e-mail.

WHEREFORE, the defendant, Justin Sean Johnson, respectfully requests this Honorable Court extend the time to file Pretrial Motions for ninety (90) days or until a time period deemed appropriate by the Court, for the reasons stated herein.

Respectfully submitted:

November 23, 2020

Date

/s/ Nicola Henry-Taylor

Nicola Henry-Taylor, Esq.

PA ID Number 79226

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